

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
KENROY F. ANSON	:	VIOLATIONS:
	:	26 U.S.C. § 7206(2) (aiding and assisting
	:	the preparation of false tax returns – 27
	:	counts)
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

THE DEFENDANT AND HIS BUSINESS

1. Defendant KENROY F. ANSON was licensed as a Certified Public Accountant (“CPA”) on or about April 21, 1999. His license expired on or about April 30, 2002 and was never renewed.

2. Defendant KENROY F. ANSON owned and operated his own tax preparation business out of his home located in Philadelphia, Pennsylvania. In the early years, defendant KENROY F. ANSON assisted in the preparation of approximately ten to twenty tax returns per year. By tax year 2004, defendant ANSON’s practice grew significantly and he assisted in the preparation of approximately 325 federal income tax returns.

THE DEFENDANT’S CLIENTS

3. The majority of defendant KENROY F. ANSON’s clients had the equivalent of a high school education, with little or no tax, accounting, or finance background or training.

Indeed, the majority of defendant ANSON's clients did not feel comfortable or knowledgeable enough to prepare their own tax returns and thus, generally retained the services of an accountant or a tax preparation firm.

4. As defendant KENROY F. ANSON did no advertising or marketing, the majority of his clients were referred to him by word-of-mouth. Many of his clients retained defendant ANSON to prepare their returns because he was knowledgeable in tax preparation, came to their homes to prepare the taxes, and obtained a significant refund for them.

THE DEFENDANT'S FRAUDULENT CONDUCT

5. Although defendant KENROY F. ANSON's CPA license expired in or about April 2002, he represented to his clients both orally and by passing out his business cards, that he was a licensed CPA. These representations were made to taxpayers during the preparation of their 2003 and 2004 federal income tax returns.

6. Defendant KENROY F. ANSON's clients provided him with their W-2s, mortgage interest documents, settlement sheets, and bank statements. Although some of his clients had receipts for charitable contributions, the vast majority of his clients did not have receipts, and thus, described their contributions to defendant ANSON. Similarly, none of defendant ANSON's clients had receipts for job expenses and thus either described the expenses they incurred or estimated the amount of their expenses.

7. In preparing the returns, defendant KENROY F. ANSON falsified three items. First, defendant ANSON exaggerated the amount his clients donated to charity. Second, defendant ANSON inflated the amount his clients incurred as unreimbursed job expenses. Third, defendant ANSON claimed that his clients incurred personal property taxes when in fact they did

not.

8. Defendant KENROY F. ANSON made the following additional misrepresentations on some of the tax returns he prepared.

- a. Defendant KENROY F. ANSON filed separate federal income tax returns for married couples by selecting false filing statuses to maximize the amount of the refund that each taxpayer received. Defendant ANSON selected false filing statuses for married couples by intentionally filing one spouse's filing status as single and the other spouse's filing status as head of household when defendant ANSON knew that the couple was married. By falsifying the status, defendant ANSON enabled his clients to obtain certain tax benefits that they were not entitled to receive.
- b. Defendant KENROY F. ANSON also falsified additional Schedule A deductions on his clients' tax returns such as real estate closing costs, tax preparation fees, non-cash charitable deductions, and unreimbursed employee business expenses, such as vehicle expense, parking, and meals and entertainment expenses.
- c. Defendant KENROY F. ANSON also falsified certain credits claimed on his clients' federal income tax returns. The false items included education credits, and child and dependent care credits.
- d. Defendant KENROY F. ANSON also intentionally excluded rental income and fabricated or falsified rental expenses in an effort to lower his clients' adjusted gross income to ultimately maximize the refund amount received by those clients.

11. Defendant KENROY F. ANSON filed these false returns electronically with the IRS, and provided the taxpayer with a copy of the return. Significantly, defendant ANSON did not provide the taxpayer a copy of the specific details regarding the business expense deductions.

12. As a result of these false statements, the additional tax due on each return as a result of the false items ranged from approximately \$310 to \$5,460. The total tax loss for 61 returns for the 2003 and 2004 calendar years was approximately \$95,591.

13. On or about April 26, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as H.A and E.A., for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that H.A. and E.A. had incurred personal property tax expenses of \$1,420, charitable contributions by cash or check of \$4,470, unreimbursed employee expenses of \$8,341, and tax preparation expenses of \$240, when in fact, defendant KENROY F. ANSON knew that H.A. and E.A. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about February 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as H.A and E.A., for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that H.A. and E.A. had incurred personal property tax expenses of \$800, charitable contributions by cash or check of \$4,440, and unreimbursed employee expenses of \$8,992, when in fact, defendant KENROY F. ANSON knew that H.A. and E.A. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as W.B. and M.B., for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that W.B. and M.B. had incurred personal property tax expenses of \$840, charitable contributions by cash or check of \$3,204, and unreimbursed employee expenses of \$6,408, when in fact, defendant KENROY F. ANSON knew that W.B. and M.B. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 4, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as W.B. and M.B., for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that W.B. and M.B. had incurred personal property tax expenses of \$1,260, charitable contributions by cash or check of \$3,480, and unreimbursed employee expenses of \$11,083, when in fact, defendant KENROY F. ANSON knew that W.B. and M.B. had not incurred those expenses; and in that the return falsely listed real estate closing costs of \$4,587 as deductible, when in fact, defendant ANSON knew that they were not deductible.

In violation of Title 26, United States Code, Section 7206(2).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as K.C. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that K.C. had incurred personal property tax expenses of \$770, charitable contributions by cash or check of \$1,331, and unreimbursed employee expenses of \$3,8926, when in fact, defendant KENROY F. ANSON knew that K.C. had not incurred those expenses; and in that the return falsely listed real estate closing costs of \$1,318 as deductible, when in fact, defendant ANSON knew that they were not deductible.

In violation of Title 26, United States Code, Section 7206(2).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 7, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as K.C. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that K.C. had incurred personal property tax expenses of \$770, charitable contributions by cash or check of \$3,008, and unreimbursed employee expenses of \$7,048, when in fact, defendant KENROY F. ANSON knew that K.C. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 21, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as D.C. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that D.C. had incurred personal property tax expenses of \$1,140, charitable contributions by cash or check of \$12,557, and unreimbursed employee expenses of \$14,067, when in fact, defendant KENROY F. ANSON knew that D.C. had not incurred those expenses; and in that the return falsely listed real estate transfer taxes of \$3,750 as deductible, when in fact, defendant ANSON knew that they were not deductible.

In violation of Title 26, United States Code, Section 7206(2).

COUNT EIGHT

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as M.D. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that M.D. had incurred personal property tax expenses of \$560, charitable contributions by cash or check of \$1,620, and unreimbursed employee expenses of \$3,118, when in fact, defendant KENROY F. ANSON knew that M.D. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT NINE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 14, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as M.D. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that M.D. had incurred personal property tax expenses of \$700, charitable contributions by cash or check of \$1,860, and unreimbursed employee expenses of \$5,170, when in fact, defendant KENROY F. ANSON knew that M.D. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as K.J.E. and K.E.E. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that K.J.E. and K.E.E. had incurred personal property tax expenses of \$1,200, charitable contributions by cash or check of \$3,960, and unreimbursed employee expenses of \$5,076, when in fact, defendant KENROY F. ANSON knew that K.J.E. and K.E.E. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT ELEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as K.J.E. and K.E.E. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that K.J.E. and K.E.E. had incurred personal property tax expenses of \$1,170, charitable contributions by cash or check of \$3,430, and unreimbursed employee expenses of \$4,355, when in fact, defendant KENROY F. ANSON knew that K.J.E. and K.E.E. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWELVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about May 3, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as G.G. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that G.G. had incurred personal property tax expenses of \$1,150, charitable contributions by cash or check of \$3,336, and unreimbursed employee expenses of \$5,406, when in fact, defendant KENROY F. ANSON knew that G.G. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT THIRTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 11, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as G.G. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that G.G. had incurred personal property tax expenses of \$1,620, charitable contributions by cash or check of \$2,984, and unreimbursed employee expenses of \$6,892, when in fact, defendant KENROY F. ANSON knew that G.G. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT FOURTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 1, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as N.J. and H.J. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that N.J. and H.J. had incurred personal property tax expenses of \$600, charitable contributions by cash or check of \$3,100, unreimbursed employee expenses of \$5,380, and tax preparation fee expenses of \$165, when in fact, defendant KENROY F. ANSON knew that N.J. and H.J. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT FIFTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about February 21, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as N.J. and H.J. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that N.J. and H.J. had incurred personal property tax expenses of \$1,080, charitable contributions by cash or check of \$3,488, and unreimbursed employee expenses of \$5,805, when in fact, defendant KENROY F. ANSON knew that N.J. and H.J. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT SIXTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 22, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as R.T. and B.T. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that R.T. and B.T. had incurred personal property tax expenses of \$1,050, charitable contributions by cash or check of \$1,475, and unreimbursed employee expenses of \$5,098, when in fact, defendant KENROY F. ANSON knew that R.T. and B.T. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT SEVENTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about February 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as R.T. and B.T. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that R.T. and B.T. had incurred personal property tax expenses of \$860, charitable contributions by cash or check of \$5,842, and unreimbursed employee expenses of \$8,491, when in fact, defendant KENROY F. ANSON knew that R.T. and B.T. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT EIGHTEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 1, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as J.W. and E.W. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that J.W. and E.W. had incurred personal property tax expenses of \$1,200, charitable contributions by cash or check of \$4,800, and unreimbursed employee expenses of \$10,647, when in fact, defendant KENROY F. ANSON knew that J.W. and E.W. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT NINETEEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 7, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of persons known to the U.S. Attorney as J.W. and E.W. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that J.W. and E.W. had incurred personal property tax expenses of \$1,640, charitable contributions by cash or check of \$5,950, and unreimbursed employee expenses of \$13,045, when in fact, defendant KENROY F. ANSON knew that J.W. and E.W. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 29, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as Y.H. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that Y.H. had incurred personal property tax expenses of \$1,200, charitable contributions by cash or check of \$4,080, and unreimbursed employee expenses of \$13,185, when in fact, defendant KENROY F. ANSON knew that Y.H. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-ONE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about July 4, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as Y.H. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that Y.H. had incurred personal property tax expenses of \$980, charitable contributions by cash or check of \$3,740, and unreimbursed employee expenses of \$10,990, when in fact, defendant KENROY F. ANSON knew that Y.H. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 4, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as S.D. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that S.D. had incurred personal property tax expenses of \$1,200, charitable contributions by cash or check of \$2,650, and unreimbursed employee expenses of \$10,273, when in fact, defendant KENROY F. ANSON knew that S.D. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 11, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as C.D. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that C.D. had incurred personal property tax expenses of \$1,370, charitable contributions by cash or check of \$6,092, unreimbursed employee expenses of \$11,823, and tax preparation fee expense of \$240, when in fact, defendant KENROY F. ANSON knew that C.D. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about April 4, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as N.D. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that N.D. had incurred personal property tax expenses of \$770, charitable contributions by cash or check of \$2,336, unreimbursed employee expenses of \$4,284, and tax preparation fee expense of \$180, when in fact, defendant KENROY F. ANSON knew that N.D. had not incurred those expenses.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 1, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as R.B. for the calendar year 2003, which was false and fraudulent as to a material matter, in that the return falsely reported that R.B. had incurred personal property tax expenses of \$860, charitable contributions by cash or check of \$1,650, and unreimbursed employee expenses of \$5,058, when in fact, defendant KENROY F. ANSON knew that R.B. had not incurred those expenses; and in that the return falsely reported that R.B. was single when in fact, defendant KENROY F. ANSON knew that R.B. was married to I.B.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 7, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as R.B. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that R.B. had incurred personal property tax expenses of \$1,291, charitable contributions by cash or check of \$3,060, and unreimbursed employee expenses of \$6,785, when in fact, defendant KENROY F. ANSON knew that R.B. had not incurred those expenses; and in that the return falsely reported that R.B. was single when in fact, defendant KENROY F. ANSON knew that R.B. was married to I.B.

In violation of Title 26, United States Code, Section 7206(2).

COUNT TWENTY-SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 are incorporated here.
2. On or about March 7, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KENROY F. ANSON

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of a person known to the U.S. Attorney as I.B. for the calendar year 2004, which was false and fraudulent as to a material matter, in that the return falsely reported that I.B. had incurred personal property tax expenses of \$840, charitable contributions by cash or check of \$1,986, and unreimbursed employee expenses of \$4,731, when in fact, defendant KENROY F. ANSON knew that I.B. had not incurred those expenses; and in that the return falsely reported that I.B. was single when in fact, defendant KENROY F. ANSON knew that I.B. was married to R.B.

In violation of Title 26, United States Code, Section 7206(2).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY